INEL
Idaho National Engineering Laboratory
Environmental Restoration

4/30/92

REV 0

ORIGINAL SIGNATURES INCLUDED

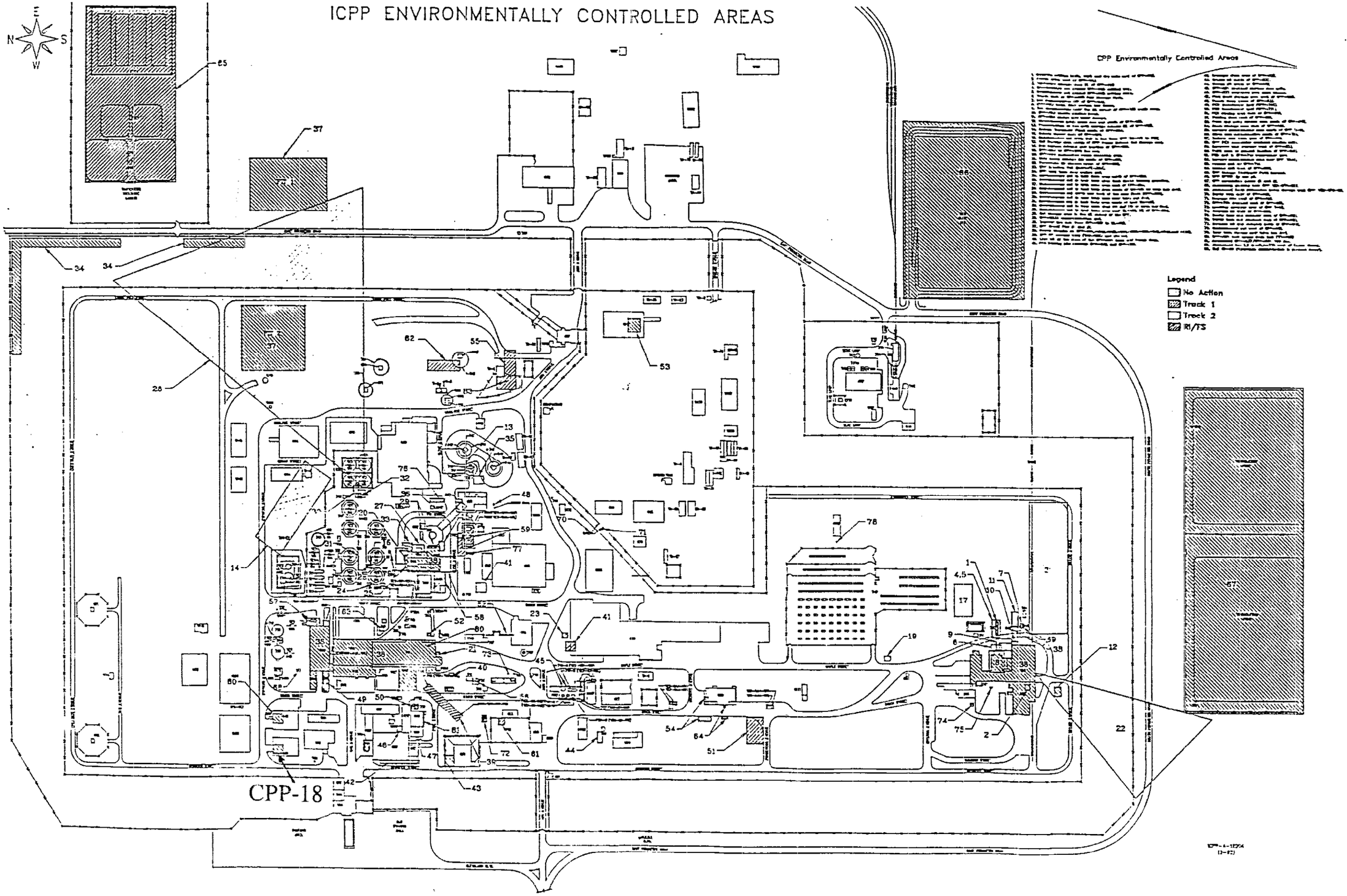
WINCO Environmental Restoration

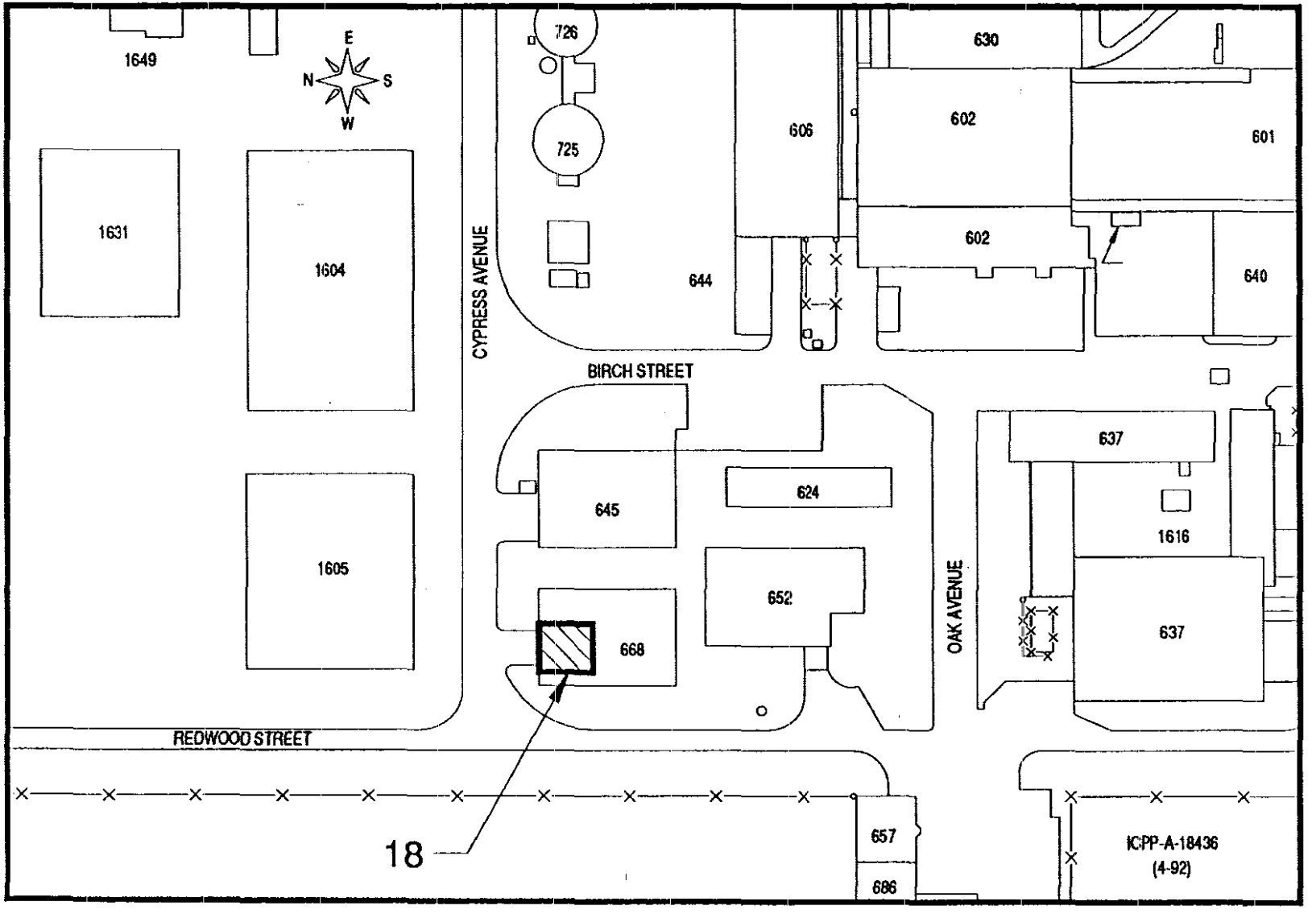
Track 1 Decision Documentation Package
Waste Area Group 3
Operable Unit 2

Site CPP-18
Gas Storage Building

Westinghouse Idaho Nuclear Company, Inc.
Idaho National Engineering Laboratory
U.S. Department of Energy, Idaho Field Office

ICPP ENVIRONMENTALLY CONTROLLED AREAS





Site CPP-18: Gas Storage Building, current location of CPP-668

NO FURTHER ACTION DETERMINATION

The U. S. Department of Energy, U.S. Environmental Protection Agency-Region 10 and the State of Idaho have completed a review of the referenced information for CPP-18 hazardous site, as it pertains to the INEL Federal Facility Agreement of 12-9-91. Based on this review, the Parties have determined that no further action for purposes of investigation or study is justified. This decision is subject to review at the time of issuance of the Record of Decision.

Brief Summary of the basis for no further action:

EPA- no documentation of release & bldg decommissioned

DOE- See attached

IDHW- See attached

References:

EPA- 4/30/92 Track I package

DOE- Track I package and references

IDHW- Track I package.

DOE Project Manager Lisa A Green for J K Kyle 9/14/92
date

EPA Project Manager Wayne Pierre 9/14/92
date

Idaho Project Manager R. Dan Hall for Dean Nygard 9/14/92
date

DECISION DOCUMENTATION PACKAGE
COVER SHEET

PREPARED IN ACCORDANCE WITH

TRACK 1 SITES:
GUIDANCE FOR ASSESSING
LOW PROBABILITY HAZARD SITES
AT INEL

SITE DESCRIPTION: GAS STORAGE BUILDING CURRENT LOCATION OF CPP-668

SITE ID: CPP-18 **OPERABLE UNIT:** 3-02

WASTE AREA GROUP: 3

I. SUMMARY - PHYSICAL DESCRIPTION OF THE SITE:

The area on which building CPP-668 is presently located was used as a gas cylinder storage area until the early to mid 1970's. Some of the spent gas cylinders stored here were brought from other plant locations and a few may have been slightly contaminated. Upon detection of any contamination, the cylinders were decontaminated either on-site or sent to the decontamination facility. After decontamination, the gas cylinders were prepared for shipment off-site. This abandoned storage area most likely is not contaminated due to the fact that only low level contamination was removed on-site and much construction has occurred in this area since the storage area was decommissioned. In addition, personnel interviewed were not aware of any contamination release from this area.

DECISION RECOMMENDATION

II. SUMMARY - Qualitative Assessment of Risk:

The qualitative risk assessment at this site for any radioactive contamination is considered low because if there was any contaminated soil released to this site it was removed with excavation for CPP-668. There is no evidence of contamination at this site. The overall reliability in the information is considered high.

III. SUMMARY - Consequences of Error:

If no action is taken at this site incorrectly small quantities of radionuclides may be left in the soil at this site, which could be a hazard due to external exposure (Cs-137) or soil ingestion (Sr-90).

IV. SUMMARY - Other Decision Drivers:

If remedial actions, such as removal of soil are taken and there is no need, there would be unnecessary expenditure of funds that could be used in remediation of other sites with greater risk.

Recommended action:

No Action.

Signatures	# Pages:	Date:
Prepared By:	DOE WAG Manager:	
Approved By:	Independent Review:	

DECISION STATEMENT
(by DOE RPM)

Date Received: 9/14/92

Disposition: CPP-18 Gas Cylinder Storage Building — Building used to store gas cylinders (1959 - mid 70's). Some low-level radioactive contamination on outside of cylinders; any encountered rad contamination was deconed on-site most likely by wiping (not fluids) based on interview of 1/20/92 with Mr. Levar Zohner (interview in report). The Storage Building was decommissioned in early 70's and the soils beneath the building were excavated to at least 5 ft in depth. Building CPP-668 was constructed over the site. Based on information contained in the package that any residual soil concentrations would have been removed due to construction of CPP 668, the State recommends no further action.

DATE: 9/14/92	# PAGES (decision statement):
NAME: R. David Hovland	SIGNATURE: R. David Hovland

R. David Hovland

DECISION STATEMENT
(by State RPM)

Date Received: 9/14/92

Disposition: CPP-18 requires no further action. Decontamination of cylinders and decommissioning of facility resulted in no significant risks left at the site.

DATE: 9/14/92	# PAGES (decision statement):
NAME: Lisa A. Green for JLyle	SIGNATURE: Lisa A Green

DECISION STATEMENT
(by EPA RPM)

CPP-18

Date Received: 9/14/92

Disposition:

source used up Till mid 70's to store radioactive cylinders. storage b/dg decomissioned and procedure was to wipe off surface contamination. New construction over old site and no documentation of past releases support no further investigation needed

DATE: 9/14/92	# PAGES (decision statement): 1
NAME: Wayne Pierce	SIGNATURE: [signature]

PROCESS/WASTE WORKSHEET
SITE ID GAS STORAGE BUILDING, CURRENT LOCATION OF CPP-668

Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Process Storage of contaminated gas cylinders	Radioactively contaminated gas cylinders; the gas cylinders were decontaminated and shipped off site. This building was removed in early 1970's.	Artifact None Location Current location of building CPP-668 Description This storage area was removed for construction of CPP-668
		Artifact Location Description
		Artifact Location Description
Process		Artifact Location Description
		Artifact Location Description
		Artifact Location Description
Process		Artifact Location Description
		Artifact Location Description
		Artifact Location Description

CONTAMINANT WORKSHEET page 13

SITE ID Gas Storage Building

PROCESS (Col 1) Storage of contaminated gas cylinders **WASTE** (Col 2) **RADIOACTIVE CONTAMINATION**

Col 4 What known/potential hazardous substances/constituents are associated with this waste or process?	Col 5 Potential sources associated with this hazardous material	Col 6 Known/estimated concentration of hazardous substances/ constituents[a]	Col 7 Risk based concentration mg/kg	Col 8 Qualitative risk assessment (Hi/Med/Lo)	Col 9 Overall reliability (Hi/Med/Lo)
Cesium-137 (Ba-137m)	N/A, soil removed for construction of CPP-668	N/A	*2.94E-03	LOW	HIGH
Strontium-90	N/A, soil removed for construction of CPP-668	N/A	1.12E-01	LOW	HIGH

a. ND = not detected
DL = detection limit in ppm
*Risk based concentration based on Cesium-137 daughter product, Ba-137m/

PROCESS CPP-18

Question 1. What are the waste generation process locations and dates of operation associated with this site?

Block 1 Answer:

The gas storage building (CPP-616) was used from approximately 1954 until the mid 1970's to store radioactively contaminated gas cylinders. The gas storage building was located where CPP-668 currently is situated. Decontamination of the gas cylinders would have consisted of simply wiping them down (Reference 4).

Block 2 How reliable is/are the information source/s? X High ___Med __Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

This information is based on ICPP personnel interviews and aerial photographs.

Block 3 Has this INFORMATION been confirmed? x Yes __No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Environmental restoration reviewed aerial photographs and engineering drawings confirming the location and dates of this site.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	[ ]		Analytical data	[ ]	
Anecdotal	[ ]		Documentation about data	[ ]	
Historical process data	[ ]		Disposal data	[ ]	
Current process data	[ ]		Q.A. data	[ ]	
Areal photographs	[x]	1	Safety analysis report	[ ]	
Engineering/site drawings	[x]	2	D&D report	[ ]	
Unusual Occurrence Report	[ ]		Initial assessment	[ ]	
Summary documents	[ ]		Well data	[ ]	
Facility SOPs	[ ]		Construction data	[ ]	
OTHER	[x]	3,4			

PROCESS CPP-18

Question 2. What are the disposal process locations and dates of operation associated with this site?

Block 1 Answer:

Records indicate that the Gas Storage Building was in use as early as 1954 and was active until it was decommissioned in the early 1970's. After the gas cylinders were decontaminated they were prepared for shipment off-site. Building CPP-668 has since been built over this site.

There are no documented records of contamination being released at this site.

Block 2 How reliable is/are the information source/s? __High x Med __Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

This information was obtained from personal correspondence.

Block 3 Has this INFORMATION been confirmed? x Yes __No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Plant drawings and aerial photographs confirm the existence of this site and the building CPP-668 which has been built over this location.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	[ ]		Analytical data	[ ]	
Anecdotal	[ ]		Documentation about data	[ ]	
Historical process data	[ ]		Disposal data	[ ]	
Current process data	[ ]		Q.A. data	[ ]	
Areal photographs	[x]	1	Safety analysis report	[ ]	
Engineering/site drawings	[x]	2	D&D report	[ ]	
Unusual Occurrence Report	[ ]		Initial assessment	[ ]	
Summary documents	[ ]		Well data	[ ]	
Facility SOPs	[ ]		Construction data	[ ]	
OTHER	[x]	3,4			

PROCESS CPP-18

Question 3. Is there empirical, circumstantial, or other evidence of migration? If so, what is it?

Block 1 Answer:

There is no evidence of migration from this site.

Block 2 How reliable is/are the information source/s? X High __Med __Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

This information is based on the reviewer's own interpretation of the data, and from WINCO initial assessment report from this site (Reference 5).

Block 3 Has this INFORMATION been confirmed? X Yes __No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Initial assessment report.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	[ ]		Analytical data	[ ]	
Anecdotal	[X]	4	Documentation about data	[ ]	
Historical process data	[ ]		Disposal data	[ ]	
Current process data	[ ]		Q.A. data	[ ]	
Areal photographs	[ ]		Safety analysis report	[ ]	
Engineering/site drawings	[ ]		D&D report	[ ]	
Unusual Occurrence Report	[ ]		Initial assessment	[X]	5 (pg.6)
Summary documents	[ ]		Well data	[ ]	
Facility SOPs	[ ]		Construction data	[ ]	
OTHER	[ ]				

PROCESS CPP-18

Question 4. Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.

Block 1 Answer:

There is no evidence that a source exists at this site. In addition to building CPP-668 being built over this site, much construction activity has occurred in this area indicating that any potential contamination has most likely been removed.

According to plant drawings, soil was removed to at least 5 feet below grade during construction of building CPP-668 (Ref. #6).

Block 2 How reliable is/are the information source/s? x High __Med __Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

The information which has been gathered is consistent between the information sources.

Block 3 Has this INFORMATION been confirmed? __Yes x No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	[ ]		Analytical data	[ ]	
Anecdotal	[ ]		Documentation about data	[ ]	
Historical process data	[ ]		Disposal data	[ ]	
Current process data	[ ]		Q.A. data	[ ]	
Areal photographs	[ ]		Safety analysis report	[ ]	
Engineering/site drawings	[x]	6	D&D report	[ ]	
Unusual Occurrence Report	[ ]		Initial assessment	[ ]	
Summary documents	[ ]		Well data	[ ]	
Facility SOPs	[ ]		Construction data	[ ]	
OTHER	[x]	3,4			

PROCESS CPP-18

Question 5. Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?

Block 1 Answer:

There is no expected pattern for potential contamination since there was no evidence of a release event ever occurring.

Block 2 How reliable is/are the information source/s? x High __Med __Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

Excavation of building CPP-668 and other construction activities over the years eliminate the possibility of contamination, therefore, no contamination pattern can be expected.

Block 3 Has this INFORMATION been confirmed? X Yes __No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Interviews with two WINCO personnel who were familiar with this area.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	[ ]		Analytical data	[ ]	
Anecdotal	[ ]		Documentation about data	[ ]	
Historical process data	[ ]		Disposal data	[ ]	
Current process data	[ ]		Q.A. data	[ ]	
Areal photographs	[ ]		Safety analysis report	[ ]	
Engineering/site drawings	[ ]		D&D report	[ ]	
Unusual Occurrence Report	[ ]		Initial assessment	[ ]	
Summary documents	[ ]		Well data	[ ]	
Facility SOPs	[ ]		Construction data	[ ]	
OTHER	[X]	3,4			

PROCESS CPP-18

Question 6. Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.

Block 1 Answer:

There is no contaminated region to estimate since no reportable contamination has ever been documented.

Block 2 How reliable is/are the information source/s? __High x Med __Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

This area would be considered clean due to the excavation which occurred when building CPP-668 was built.

Block 3 Has this INFORMATION been confirmed? X Yes __No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Several independent interviews w/WINCO personnel have confirmed this information.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	[ ]		Analytical data	[ ]	
Anecdotal	[ ]		Documentation about data	[ ]	
Historical process data	[ ]		Disposal data	[ ]	
Current process data	[ ]		Q.A. data	[ ]	
Areal photographs	[ ]		Safety analysis report	[ ]	
Engineering/site drawings	[ ]		D&D report	[ ]	
Unusual Occurrence Report	[ ]		Initial assessment	[ ]	
Summary documents	[ ]		Well data	[ ]	
Facility SOPs	[ ]		Construction data	[ ]	
OTHER	[X]	3,4			

PROCESS CPP-18

Question 7. What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.

Block 1 Answer:

Due to the non-contaminated status of the soil, the estimated quantity of hazardous substance/constituent at this site is zero.

Block 2 How reliable is/are the information source/s? x High __Med __Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

Historical records indicate that this area has been excavated, thus removing any potential contamination.

Block 3 Has this INFORMATION been confirmed? x Yes __No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Construction drawings of CPP-668 confirm the excavation of this area.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	[ ]		Analytical data	[ ]	
Anecdotal	[ ]		Documentation about data	[ ]	
Historical process data	[ ]		Disposal data	[ ]	
Current process data	[ ]		Q.A. data	[ ]	
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Unusual Occurrence Report	[ ]		Initial assessment	[ ]	
Summary documents	[ ]		Well data	[ ]	
Facility SOPs	[ ]		Construction data	[ ]	
OTHER	[ ]				

PROCESS CPP-18

Question 8. Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.

Block 1 Answer:

Evidence supports that the source has been removed and that there is no hazardous substance/constituent present.

Block 2 How reliable is/are the information source/s? X High __Med __Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

Building CPP-668 excavation would have removed any potential contamination if it had been present.

Block 3 Has this INFORMATION been confirmed? X Yes __No (check one)

IF SO, DESCRIBE THE CONFIRMATION.

Interviews with WINCO plant personnel familiar with this area.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	[ ]		Analytical data	[ ]	
Anecdotal	[ ]		Documentation about data	[ ]	
Historical process data	[ ]		Disposal data	[ ]	
Current process data	[ ]		Q.A. data	[ ]	
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Unusual Occurrence Report	[ ]		Initial assessment	[ ]	
Summary documents	[ ]		Well data	[ ]	
Facility SOPs	[ ]		Construction data	[ ]	
OTHER	[X]	3.4			

REFERENCES

1. WINCO, Photograph #54 13216, Aerial view of CPP looking northwest; November 24, 1954; WINCO Photograph #60-5412, Aerial view of ICPP looking southeast.

2. WINCO, Drawing No. CPP-004-100-1, building 614, 615, 616, grading plans, Date: 6/4/53.

3. WINCO, personal communication from Adam Owen (Environmental Compliance) to Russ Stuart (Environmental Compliance), 1/14/92.

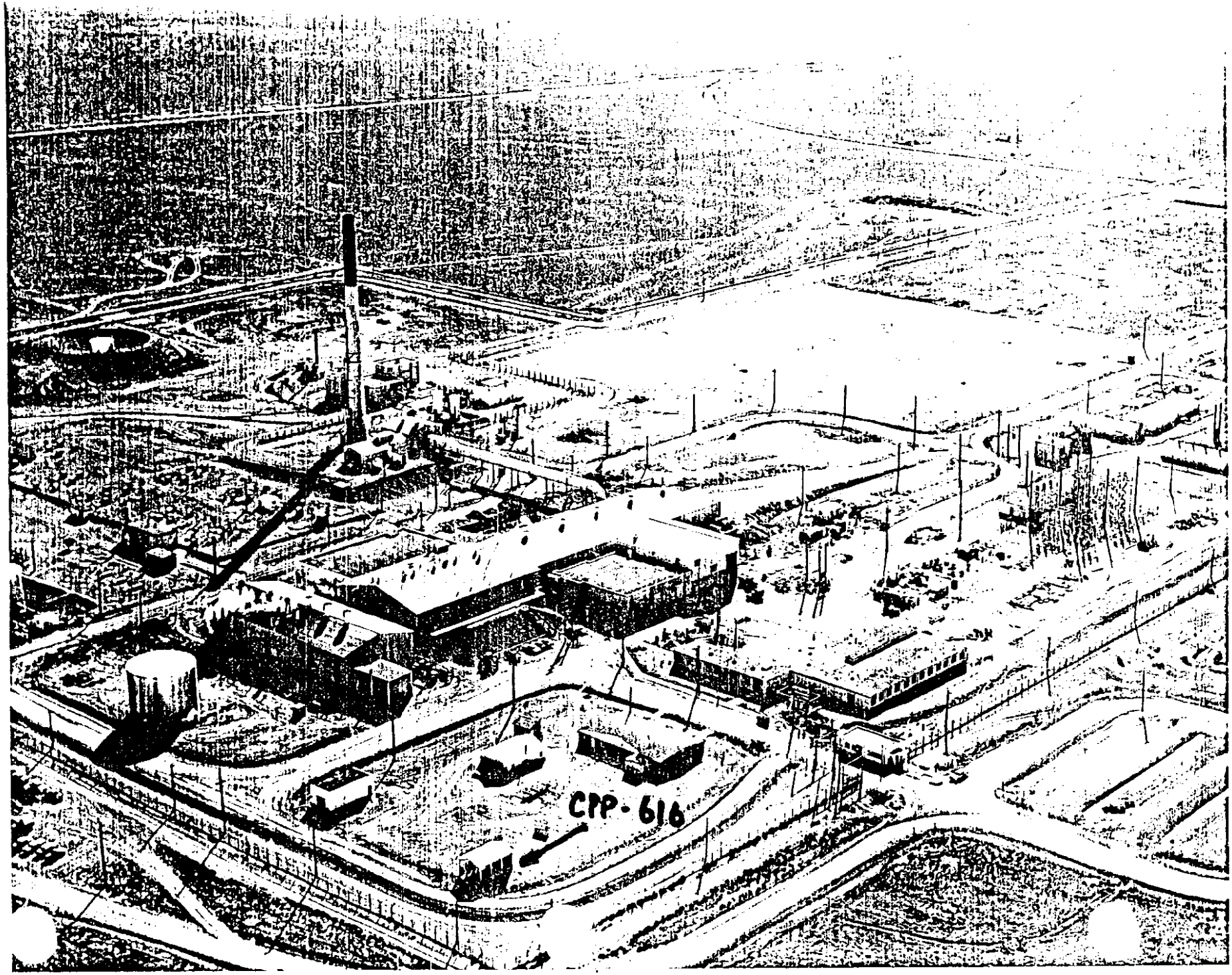
4. WINCO, personal communication from Adam Owen (Environmental Compliance) to Levar Zohner (Production), 1/20/92.

5. WINCO, Initial Assessment Form, July 10, 1987.

6. WINCO, Drawing No's CPP-K-369-SHT. 3 and CPP-K-369-SHT.1 (building CPP-668)

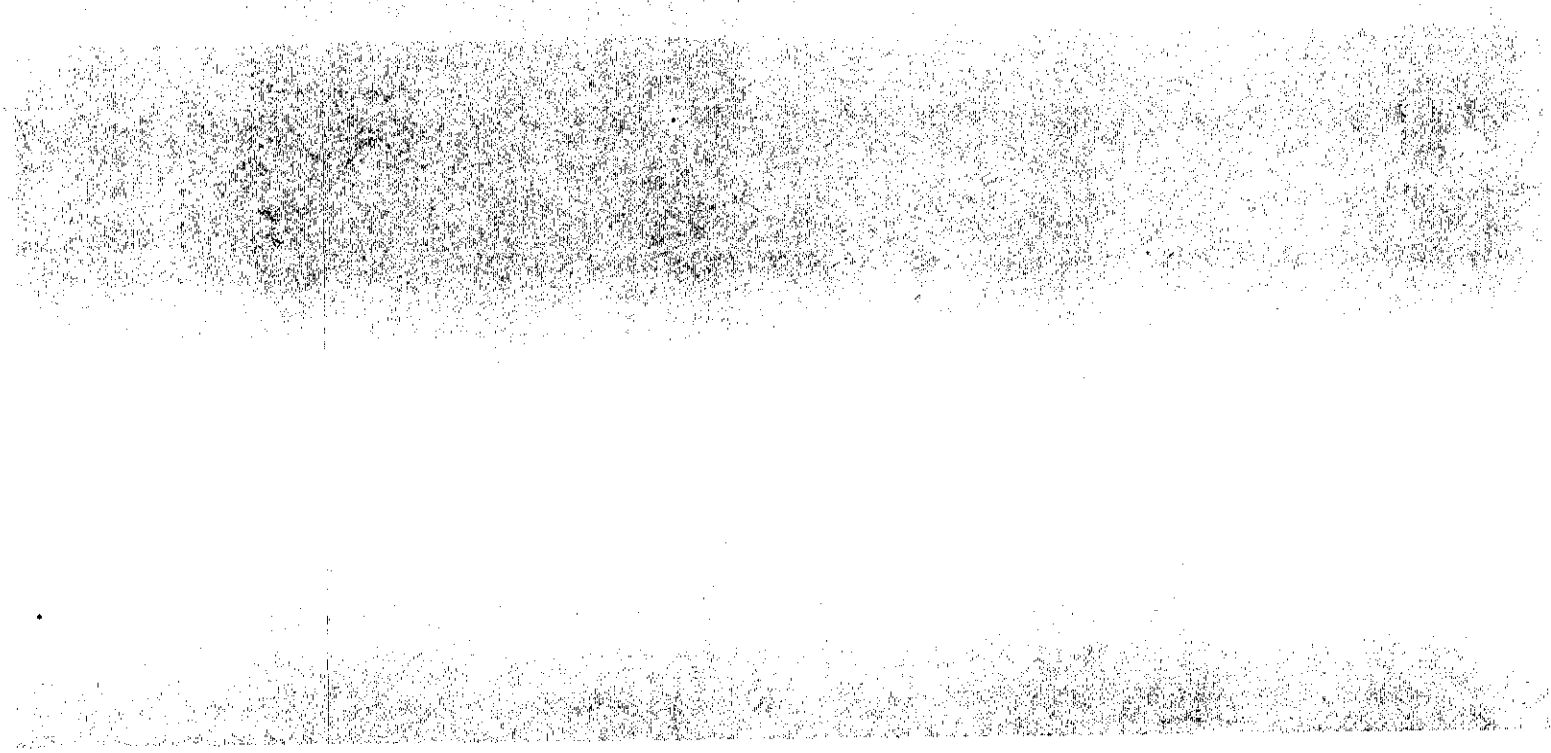
7. Track 1 Risk Evaluation Summary for site CPP-18, performed by EG&G Idaho, 1/24/92.

Reference 1


CPP-616

Reference 2

Reference 3



FORM WINCO-5027 (6-84)

Westinghouse Idaho Nuclear Company, Inc.

Attachment A
WPD 1-08
Page 1 of 1

AUG 12 1993

MEMO OF CONVERSATION

Date 1/14/92 Time 2:00 pm Commitment Made ☐ Yes ☒ No Date: _____

Person Calling ADAM OWEN Person Called RUSS STUART

Representing WINCO Representing WINCO

Purpose of Conversation INFORMATION ON SITE CPP-18 - GAS CYLINDER STORAGE AREA

Text of Conversation I TALKED TO RUSS STUART, (WHO HAS WORKED AT THE CHEM PLANT FOR APPROXIMATELY 25 YRS) IN ORDER TO GATHER INFORMATION ON ECA CPP-18; THIS AREA WAS KNOWN AS -616 BOTTLED GAS STORAGE. ACCORDING TO RUSS IT WAS A BUILDING WITH A RAISED FLOOR SO THAT TRUCKS COULD BACK UP AND UNLOAD BOTTLED GAS CYLINDERS. IT HAD A ROOF AND OPEN SIDES. CHAIN LINK FENCE SERVED AS THE WALLS FOR THIS BUILDING. IT WAS USED FROM APPROXIMATELY 1957 TO THE MID 1970'S. NOT AWARE OF ANY CONTAMINATION RELEASE FROM THIS BUILDING

Signed Adam K Owen Date 1/14/92

Reference 4

FORM WINCO-5027 (8-84)

Westinghouse Idaho Nuclear Company, Inc.

Attachment A
WPD 1-08
Page 1 of 1

AUG 12 1992

MEMO OF CONVERSATION

Date 1/20/92 Time 9:45 Commitment Made ☐ Yes ☐ No Date: _____

Person Calling ADAM OWEN Person Called ISVAR ZOHNER

Representing ENVIRONMENTAL RESTORATION Representing PRODUCTION

Purpose of Conversation POTENTIAL CONTAMINATION of ENVIRONMENT AT OLD GAS CYLINDER STORAGE AREA (SCA CPP-18)

Text of Conversation

Q. WERE YOU AWARE of ANY CONTAMINATION TO THE ENVIRONMENT FROM THIS BUILDING

A. NONE THAT HE WAS AWARE of. ANY DECON OF THE CYLINDERS WOULD HAVE CONSISTED OF SIMPLY WIPING THEM DOWN.

Signed Adam Owen Date 1/20/92